

Patterson Construction, Inc.
Isaac Patterson, Project Manager
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Submitted: September 27, 2004

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF)	Docket No. 03-049-62
QWEST CORPORATION'S LAND)	
DEVELOPMENT AGREEMENTS (LDA))	Patterson Construction, Inc.
TARIFF PROVISIONS)	Isaac Patterson, Project Manager
)	
)	PETITION TO INTERVENE
)	

Pursuant to Utah Code Ann. § 63-46b-9 and Utah Admin. Rule 746-100-7, Patterson Construction, Inc. ("Patterson Construction") respectfully petitions the Public Service Commission of Utah (the "Commission") for leave to intervene in the above-captioned proceeding concerning Qwest Corporation's Land Development Agreements tariff provisions in the state of Utah. In support of its petition, Patterson Construction represents and states as follows:

1. Patterson Construction is a business, for residential land development throughout the state of Utah, principally along the Wasatch front region.

2. As a residential land developer, within the telecommunications service area of Qwest Corporation, Patterson Construction needs Qwest telephone networks to be developed in its projects here in Utah. The outcome of Qwest Corporation's LDA Tariff docket could result in significant added costs and construction delays to Patterson Construction. Thus, the legal interests of Patterson Construction could be directly affected by the outcome of this proceeding.

3. The interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by allowing Patterson Construction to intervene.

WHEREFORE, Patterson Construction respectfully requests that the Commission enter an Order granting Patterson Construction's Petition to Intervene as a party in this docket, allowing Patterson Construction to participate to the full extent allowed by the rules of the Commission and by Utah law.

RESPECTFULLY SUBMITTED this 27th day of September, 2004.

Patterson Construction, Inc.

By: Isaac Patterson
Title: Project Manager

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of September, 2004; an original, with five (5) true and correct copies and an electronic copy, of Patterson Construction's **PETITION TO INTERVENE** was hand-delivered to:

Julie Orchard
Commission Secretary
Public Service Commission of Utah
Heber M. Wells Building, Fourth Floor
160 East 300 South
Salt Lake City, Utah 84114
lmathie@utah.gov

and a true and correct copy was mailed, postage prepaid thereon, to:

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Division of Public Utilities
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